



Association for Local Telecommunications Services

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RICHARD J. METZGER  
VICE PRESIDENT &  
GENERAL COUNSEL

January 22, 1998

EX PARTE OR LATE FILED

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M St., N.W.  
Washington, D.C. 20054

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

- Re: (1) Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services in Michigan, CC Docket No. 97-137;
- (2) Application by SBC Communications Inc., Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services In Oklahoma, CC Docket No. 97-121;
- (3) Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in South Carolina, CC Docket No. 97-208;
- (4) Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, CC Docket No. 97-231;
- (5) Request for Expedited Letter Clarification--Inclusion of Local Calls to ISPs Within Reciprocal Compensation Agreements, CC No. 96-98;
- (6) Petition for Expedited Rulemaking - Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; CC Docket No. 96-98, RM-9101;
- (7) In the Matter of Expanded Interconnection with Local Telephone Company Facilities; CC Docket No. 91-141

Dear Ms. Salas:

On Wednesday afternoon and Thursday morning, members of ALTS met with Commission staff to discuss various matters involving checklist compliance by BellSouth (see the attached attendance lists, and the attached items distributed at these meetings).

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Discussion on Wednesday afternoon included:

- Dan Gonzalez discussed NEXTLINK's experience with BellSouth's process for ordering poles.
- Nanette Edwards described DeltaCom's difficulties with BellSouth's unannounced changes to its E911 update system, and its refusal to provide E911 information as required in its interconnection agreement.
- Jim Falvey addressed ACSI's efforts to obtain number portability from BellSouth.
- Dan Gonzalez recounted NEXTLINK's service problems in its interconnection facilities with BellSouth.
- Dave Porter of WorldCom and Jim Falvey discussed the unusually high NRCs charged by BellSouth for all types of loops, the unduly high level of recurring costs for loops, and the absence of loop unbundling.
- Julia Strow and myself addressed BellSouth's failure to pay reciprocal compensation on local calls to ISPs exchanged with CLECs even though it does pay for such calls under reciprocal compensation arrangements with adjacent LECs, and treats these calls as local in its ARMIS reports, separations reports, and state rate cases.
- Dan Gonzalez raised problems encountered by NEXTLINK with its white pages listings.
- Nanette Edwards discussed dialing parity issues that had been created by BellSouth.

Topics addressed today included:

- A demonstration by Julia Strow that the vast majority of EDI orders sampled by ICI have missed the 48 hour FOC standard, followed by a discussion of LCUG performance standards by Rich Fruchterman, and ALTS performance standards by myself.
- A discussion of OSS was conducted by Nanette Edwards, Sandra Stisher and

Ms. Magalie Roman Salas

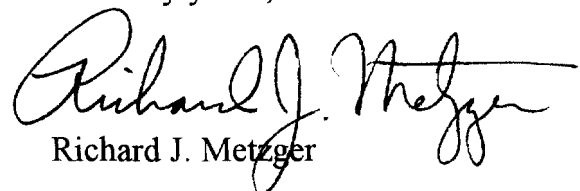
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Mike Thomas of DeltaCom, and Julia Strow and Cheryl Wilcoxon of ICI. The current Harbinger EDI interface required by BellSouth was criticized, and participants pointed out that implementation of an EDI interface had failed to generate service improvements, leading to the strong inference that BellSouth continues to rely on manual intervention behind its EDI interface, even for simple resale orders.

- Collocation issues were addressed by Janine Kemp Moses of DeltaCom and myself. Ms. Moses explained that collocation was extremely expensive with BellSouth, in excess of \$300 per square foot, and that BellSouth has resisted implementation of physical collocation. Furthermore, implementation was extremely time-consuming, given the inflexible process demanded by BellSouth. I pointed out that the business schedules of most CLECs forced them to accept onerous collocation provisions rather than resort to arbitration, state decisions, and court appeals. Although the Commission originally declined to apply its various rulings concerning tariffed collocation to negotiated arrangements, it retains full authority to end these practices by promptly prescribing just and reasonable rates, terms and conditions for both physical and virtual collocation.
- Julia Strow and Rich Fruchterman gave a short account of our concern that BellSouth was utilizing the October 14th order of the Eighth Circuit to hamper the implementation of simple orders, such as extended loops, by contending such orders are "recombinations." We expressed our belief that the Commission has full power under Section 271 to prevent such gaming.
- Nanette Edwards and Dan Gonzalez concluded the meeting by providing information on E911 and trunk blocking that had been requested yesterday.

Sincerely yours,



Richard J. Metzger

cc: J. Goldstein  
M. Newman  
M. Kellogg  
J. Lenahan  
M. McDermott

1/21/98

Richard J. Metzger - ALTS - 202-969-2583

William J. Bailey - FCC - 202-418-7285

IRBON GOLSTEN - FCC/Policy - " 418-2694

Jonathan Askin - " - 202-418-2764

David Kirschner - FCC/Policy - 202-418-0544

DAVID N. PORTER - WorldCom - 202-776-1550

ERIC BASH - FCC/Policy - 418-1188

Susan Launer - FCC Policy - 418-7182

Andrew Wright - FCC/Policy - 418-2725

Jeannie Su - FCC/Policy - 418-0491

MIKE RORDAN - FCC - 418-2043

Michael Pryor - FCC/Policy - 418-0495

Melissa Newman - FCC/Policy - 418-1508

Sharon Gold - ALTS - 969-2587

DAN GONZALEZ - NEXTLINK - 466-9766

Julia Straw - Intermedia - 813-829-2072

Jim Falvey - ACSI - 301-617-4298

Nanette Edwards - DeltaCom - 205-650-3856

Gregory Cooke - FCC/NSD - 202-418-2351

Craig Brown - FCC/Policy - 202/418-1566

Rich Lerner - FCC/Competitive Pricing Division - 418-~~418~~1530

Doug Gallo - FCC/Pricing

Ann Seem - FCC/Pricing

1/22/98

Michael Pryor	FCC / Policy	418-0495
Jonathan Askin	FCC / Policy	418-2764
Bill Bailey	FCC / Policy	418-7285
Jordan Goroski	FCC / Policy	418-2694
Audrey Wright	FCC / Policy	418-2725
Joe Welch	FCC / Policy	418-1598
Doug Galbi	FCC / Policy	418-2218
Michelle Carey	FCC / Policy	418-1557
KATHERINE SCHRODER	FCC / Policy	418-1580
Jake A. Jennings	FCC / Policy	418-1580
Eric Brantman	Sandler & Berlin	424-7553
DAN GONZALEZ	NEXTELINK	466-9755
Janine Kemp Moses	DeltaCom	(205) 241-3705
Nanette Edwards	DeltaCom	(205) 650-3866
Rich FRUCHTERMAN	WorldCom	202/776-1554
Cheryl Wilcoxen	INTERMEDIA	813 829-2326
Sandra Stisher	DeltaCom	205-586-7423
Michael E. Thomas	DeltaCom	205-650-3853
Julia Strow	Intermedia	813-829-2072

<b>BellSouth</b>									
<b>SGAT</b>									
<b>Florida</b>				<b>Georgia</b>			<b>North Carolina</b>		
	<b>Monthly</b>	<b>Nonrecurring</b>		<b>Monthly</b>	<b>Nonrecurring</b>		<b>Monthly</b>	<b>Nonrecurring</b>	
<b>Unbundled Loops</b>	<b>Recurring</b>	<b>First</b>	<b>Add'l</b>	<b>Recurring</b>	<b>First</b>	<b>Add'l</b>	<b>Recurring</b>	<b>First</b>	<b>Add'l</b>
2w Analog Voice Grade	\$ 17.00	\$ 140.00	\$ 42.00	\$ 25.28	\$ 75.37	\$ 48.63	\$ 16.71	\$ 86.50	\$ 27.80
4w Analog Voice Grade	\$ 30.00	\$ 141.00	\$ 43.00	\$ 36.42	\$ 392.95	\$ 294.62	\$ 38.65	\$ 86.50	\$ 27.80
2w ADSL Compatible	\$ 17.00	\$ 140.00	\$ 42.00	\$ 20.75	\$ 611.82	\$ 517.23	\$ 20.50	\$ 280.15	\$ 243.91
2w HDSL Compatible	\$ 17.00	\$ 140.00	\$ 42.00	\$ 15.39	\$ 611.82	\$ 517.23	\$ 14.75	\$ 280.15	\$ 243.91
4w HDSL Compatible	\$ 30.00	\$ 141.00	\$ 43.00	\$ 19.33	\$ 637.27	\$ 543.29	\$ 20.05	\$ 291.43	\$ 255.46
2w ISDN Digital	\$ 40.00	\$ 306.00	\$ 283.00	\$ 35.98	\$ 432.32	\$ 309.41	\$ 38.00	\$ 276.96	\$ 234.99
4w DS1 Digital	\$ 80.00	\$ 540.00	\$ 465.00	\$ 72.09	\$ 732.05	\$ 435.19	\$ 151.50	\$ 568.96	\$ 335.56
4w 64 kbps digital	---	---	---	\$ 41.71	\$ 614.99	\$ 402.63	---	---	---
<b>Transport</b>									
<b>Common</b>									
Facility Term per MOU	\$ 0.000500	---	---	\$ 0.00037	---	---	\$ 0.00036	---	---
Mile/MOU	\$ 0.000012	---	---	\$ 0.00001	---	---	\$ 0.00004	---	---
<b>Dedicated</b>									
DS0 Facility Term	---	---	---	\$ 17.74	\$ 141.38	\$ 55.81	\$ 38.67	\$ 24.01	---
Mile/MOU	---	---	---	\$ 0.0146	---	---	\$ 3.95	---	---
DS1 Facility Term	\$ 59.75	\$ 100.49	---	\$ 69.23	\$ 221.93	\$ 167.85	\$ 90.00	\$ 100.49	---
Mile/MOU	\$ 1.60	---	---	\$ 0.297	---	---	\$ 23.00	---	---
DS3 Facility Term	---	---	---	---	---	---	\$ 1,200.00	\$ 67.19	---
Mile/MOU	---	---	---	---	---	---	\$ 175.00	---	---
<b>Cross Connects</b>									
2w Analog	\$ 0.30	\$ 9.25	---	\$ 0.28	\$ 42.97	\$ 40.38	\$ 0.30	\$ 19.20	---
4w Analog	\$ 0.50	\$ 9.25	---	\$ 0.57	\$ 43.12	\$ 40.42	\$ 0.50	\$ 19.20	---
DS1	\$ 9.28	\$ 113.75	\$ 14.25	\$ 2.16	\$ 72.38	\$ 52.19	\$ 8.00	\$ 155.00	\$ 27.00
DS3	\$ 72.48	\$ 113.75	\$ 14.25	\$ 38.91	\$ 71.17	\$ 50.53	\$ 72.00	\$ 155.00	\$ 27.00
<b>Loop Concentration</b>									
System (DS1 to VG)	\$ 480.00	\$ 350.00	\$ 90.00	\$ 305.58	\$ 434.43	\$ 106.15	\$ 400.00	\$ 305.00	\$ 74.20
VG Interface per Circuit	\$ 1.50	\$ 5.75	\$ 5.50	\$ 0.98	\$ 35.89	\$ 35.65	\$ 1.15	\$ 5.05	\$ 4.85

# EDI Performance

## Intermedia Communications Inc

- 80% of orders processed missed the 48 hour firm order committment (8/15/97 thru 1/16/98)
- Delinquent Orders
  - 36% less than 5 days overdue
  - 38% 6-10 days overdue
  - 9% 11-30 days overdue
  - 11% 31-60 days overdue
  - 4% 61-90 days overdue
  - 2% 90+ days overdue